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Periodic Reporting
(Proposal Nine)

Docket No. RM2015-2

CHAIRMAN'S INFORMATION REQUEST NO. 3

(Issued February 13, 2015)

To clarify the Postal Service's petition¹ to consider changes to analytical principles, filed October 31, 2014, the Postal Service is requested to provide a written response to the following questions and requests. Proposal Nine contains multiple components. Questions below are grouped by specific Proposal Nine component and are shown in bold text. The answers should be provided by February 23, 2015.

Proposal Nine—Component One: Replace the Source for the Office and Street Time Split

1. In FY 2013, over \$190 million in in-office costs were for city carriers that were clocked to street but for which the In-Office Cost System (IOCS) data collector recorded the sampled employee as being on the premises.² The Postal Service Response to CHIR No. 1, question 12 states: "IOCS tallies where the carrier is clocked to the street would be assigned zero cost."³ For each of the activities listed in Tables 1-4, please identify which activities will be classified as an in-office time cost and which activities will be classified as a street time cost under

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Nine), October 31, 2014 (Petition).

² Generally, IOCS question 16A01='B' clocked to street and question 16A02='Y'-on premises (weighted by associated dollar cost weight). The Commission-produced IOCS cost estimates are based on the data provided in Docket No. ACR2013 Library Reference USPS-FY13-37, December 27, 2013/'Data' folder, 'PRCPub13.sas' file. The over \$190 million cost estimate referenced in the question is the sum of the 'Street' column totals shown in Tables 1-3.

³ Responses of the United States Postal Service to Questions 1-14 and 17-18 of Chairman's Information Request No. 1, and Status Report on Questions 15-16, November 21, 2014 (Postal Service Response to CHIR No. 1).

Proposal Nine. Also, please provide the rationale for the classification to office or street cost for each of the IOCS listed activities shown in Tables 1-4.

Table 1
FY 2013 Estimated Costs for IOCS Assigned Activity
of City Carrier Employees On the Premises*

Q16F03A: Activities AT Carrier Case	Clocked Status (Q16A01)		Q16A02 On premises
	Office \$	Street \$	
Preparing Mail for Sequencing/ Loading Ledges	52,659,370	629,332	Yes
Sequencing/Casing Mail	1,456,838,000	17,788,330	Yes
Withdrawing/Pulling Down/Strapping Out Mail (From Carrier Case)	294,956,500	7,521,313	Yes
Handling Undeliverable As Addressed Mail	5,797,065	513,037	Yes
Obtaining or Returning Accountables or Keys	10,405,420	568,163	Yes
Doing an Activity Related to Scanning Delivery Confirmation or Signature Confirmation	5,540,383	188,424	Yes
Leaving or Preparing to Leave for Route	54,002,960	5,158,887	Yes
Returning from Route or Activities Related to Return	7,429,471	2,181,670	Yes
Other Activity	47,537,340	1,462,180	Yes
Total	1,935,166,509	36,011,336	
<p>*See the IOCS description in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'IOCSDataEntryFlowchartFY13.xlsx', 'Q16' worksheet.</p> <p>Source: The Commission-produced IOCS estimates shown in the table above are based on the data in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'Data' folder, 'PRCPub13.sas' file.</p>			

Table 2

**FY 2013 Estimated Costs for IOCS Assigned Activity
of City Carrier Employees On the Premises***

Q16F03B: Activities AWAY from Carrier Case	Clocked Status (Q16A01)		Q16A02 On premises
	Office \$	Street \$	
Obtaining Mail	120,333,000	1,968,314	Yes
Preparing & Checking Vehicle	185,799,000	5,515,754	Yes
Handling Undeliverable As Addressed	7,487,708	247,403	Yes
Obtaining or Returning Accountables or Keys	42,798,760	2,863,173	Yes
Doing an Activity Related to Scanning Delivery Confirmation or Signature Confirmation	6,268,883	107,954	Yes
Leaving or Preparing to Leave for Route	236,655,900	103,150,900	Yes
Returning from Route or Activities Related to Return	25,542,880	12,618,080	Yes
Other Activity	138,603,600	5,138,136	Yes
Total	763,489,731	131,609,714	
<p>* See the IOCS Description in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'IOCSDataEntryFlowchartFY13.xlsx', 'Q16' worksheet.</p> <p>Source: The Commission-produced IOCS estimates shown in the table above are based on the data in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'Data' folder, 'PRCPub13.sas' file.</p>			

Table 3
FY 2013 Estimated Costs for IOCS Assigned Activity
of City Carrier Employees Not Handling Mail On the Premises*

Q16F02B: Activity of Employee Not Handling Mail	Clocked Status (Q16A01)		Q16A02 On premises
	Office \$	Street \$	
Handling Empty Equipment or Container	52,179,080	9,746,033	Yes
Participating in Safety/Service Talk	62,610,990	950,356	Yes
Taking a Break or Attending to Personal Needs	416,985,900	12,567,220	Yes
Clocking to Begin or End Their Tour	100,152,400	3,552,227	Yes
**Total	631,928,370	26,815,836	
<p>* See the IOCS Description in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'IOCSDataEntryFlowchartFY13.xlsx', the 'Q16' worksheet.</p> <p>**Note: All possible responses to Q16F02B are not listed nor included in the total costs shown in Table 3.</p> <p>Source: The Commission-produced IOCS estimates shown in the table above are based on the data provided in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'Data' folder, 'PRCPub13.sas' file.</p>			

Table 4

**FY 2013 Estimated Costs for IOCS Assigned Loading/Unloading Vehicle Activity
of City Carrier Employees On the Premises***

IOCS Question Cross Tabulation for Loading/Unloading Vehicle (IOCS Activity Code 6422)	Clocked Status (Q16A01)		Q16A02 On premises
Q16F03A: Activities AT Carrier Case	Office \$	Street \$	
Leaving or Preparing to Leave for Route	31,088,310	3,272,244	Yes
Returning from Route or Activities Related to Route	4,164,081	921,641	Yes
Q16F03B: Activities AWAY from Carrier Case			
Leaving or Preparing to Leave for Route	115,395,300	46,844,520	Yes
Returning from Route or Activities Related to Route	18,031,130	8,372,266	Yes
Total Estimated Costs for Loading Vehicle (Activity Code 6422)** \$228,089,470	168,678,821	59,410,671	Yes
<p>*See the IOCS description in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'IOCSDataEntryFlowchartFY13.xlsx', 'Q16' worksheet.</p> <p>**The Commission-produced IOCS estimated costs total for activity code 6422-loading/unloading vehicle matches the Postal Service's total shown in Docket No. ACR2013, Library Reference USPS-FY13–32, Revised-2-6-14, February 6, 2014, file 'CS06&7.Revised.xls, worksheet 'Input IOCS', cell M24.</p> <p><i>Note:</i> Table 4 is a subset of the same costs presented in Tables 1 and 2 for IOCS questions Q16F03A and Q16F03B with the IOCS final assigned activity code in field f262=6422.</p> <p>Source: The Commission-produced IOCS estimates shown in the table above are based on the data provided in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'Data' folder, 'PRCPub13.sas' file.</p>			

2. In FY 2013, the IOCS final edited activity code reassigned over \$69 million in costs for carriers clocked as in-office but performing activities related to street time. See Table 5. Please explain how these costs would be assigned under Proposal Nine.

Table 5
FY 2013 Estimated Costs for IOCS Assigned ‘Street Time’

IOCS Activity Code (IOCS Created Field F262)	Clocked Status (Q16A01)		Q16A02 On premises
	Street \$	Office \$	No
6710-Street Costs**	11,972,724,000	69,313,850	
**Total \$12,042,038,000			

**The Commission-produced IOCS total city carrier street costs estimate matches the Postal Service's total shown in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'FY 13 IOCS CVs public.xlsx' file, worksheet 'City Carrier', cell B67. The same total city carrier street time value is also shown in Docket No. ACR2013, Library Reference USPS–FY13–32, Revised-2-6-14, February 6, 2014, 'CS06&7.Revised.xls' file, '6.0.3' worksheet, cell E48.

Source: The Commission-produced IOCS estimates shown in this table are based on data provided in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'Data' folder, 'PRCPub13.sas' file.

3. In the 'TACS Ofc_Str' worksheet of the 'I_FORMS_TACS.xlsx' file in cell E15, the 'TACS' column, 'Total Accrued' row shows over a \$100 million higher value for the SPR routes group and over a \$100 million lower value for the letter routes group (cell E6) than that shown for the respective values in the 'IOCS' column B of this same worksheet.⁴
- To what does the Postal Service attribute these differences? Please include in your response any methodology differences in terms of route group costs development.
 - The total city carrier street costs obtained from the TACS and MODS operation codes is greater than the higher bound 95 percent confidence

⁴ See Library Reference USPS–RM2015–2/1, October 31, 2014, 'I_FORMS_TACS.xls' file, 'TACS Ofc_Str' worksheet.

interval value estimated by the IOCS. Please discuss the reasons for the higher total city street costs obtained from the TACS and MODS operation codes.⁵

4. How were the training and clocking in/out costs for letter routes, SPR routes, and Route 99 determined from the TACS and MODS operation codes?⁶ Please specify the calculation methodology for each value in the 'TACS_Ofc_Str' worksheet cells E11, E12, E20, E21, G11, G12 in the 'I_FORMS_TACS.xls' file provided in Library Reference USPS–RM2015–2/1.
5. In the Petition, the Postal Service states: “The office/street split percentage for letter routes is determined by hours clocked to LDCs [Labor Distribution Codes] 21, 22, and 26. The split for SPR is determined using the hours clocked in TACS to the office and street MODS codes with LDCs 23 and 27.”⁷ However, LDCs other than those mentioned in the Petition were included in the Postal Service’s response as to how the office and street workhours would be determined in the file 'Chir1.Q10.MODS.xlsx' provided in Library Reference USPS–RM2015–2/2. The following questions relate to the LDCs not mentioned in the Petition (LDCs 28 and 29) and for the MODS codes where route type or office/street workhours are not specified in the operational definition or name.
 - a. In LDC 29, three MODS Operation Codes (709-711) are labeled with the Operation Name ‘Routers’ and another MODS Operation Code (712) has the Operation Name 'Router PM Office Time'. The MODS Handbook describes the ‘Routers’ operation codes as logging employee workhours

⁵ See Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'FY13 IOCS CVs public.xlsx' file, 'City Carrier' worksheet, cell B67 and (in this docket) Library Reference USPS–RM2015–2/1, October 31, 2014, 'I_FORMS_TACS.xls' file, 'TACS Ofc_Str' worksheet, city carrier street total (cell F7 plus cell F16). The IOCS upper bound 95 percent confidence interval shown in the first referenced file is \$12,112,253,000 and the MODS and TACS city carrier street total is shown as \$12,211,821,000 in the second referenced file.

⁶ There are no specific MODS operation codes listed for these activities in the list of MODS codes provided in the Postal Service Response to CHIR No. 1, question 10 (MODS codes were provided in Library Reference USPS–RM2015–2/2, November 21, 2014, 'Chir1.Q10.MODS.xlsx' file).

⁷ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Nine), October 31, 2014, Proposal Nine at 2 (Petition).

used by delivery service employees assigned to router positions, responsible for casing mail for more than one delivery assignment. How does the Postal Service know in which type of route or routes these 'Routers' workhours would be clocked?

- b. Would all 'Routers' workhours be clocked to office?
 - c. For both LDC 28, MODS operation code 768, operation name 'City Carrier-Tertiary Distribution' and LDC 26, MODS operation code 993, operation name 'Loaned as City Carrier', what type of route would be associated with these workhours?
 - d. How would the Postal Service distinguish whether the workhours are office or street logged to MODS operation codes 768 and 993?
6. In the Petition, Proposal Nine at 2, the Postal Services states: "In the administration of delivery operations, loading and unloading vehicles are considered to be street functions. Carriers are trained to be 'clocked to street' whenever they are loading or unloading mail from their vehicle." The same activities, under the current costing methodology, are designated as in-office activities in the IOCS and are reported as office costs. Please discuss the reasons for, and/or the origin of, the distinction in the two definitions.⁸

Proposal Nine—Component Two: To Further Subdivide Street Costs, Street Costs Associated with Loading/Unloading a Vehicle will be Derived by Multiplying TACS-based Street Costs with the Proportion of Vehicle Loading/Unloading Time from the Form 3999 Database

7. In the Postal Service's file, 'I_FORMS_TACS.xlsx', provided in Library Reference USPS–RM2015–2/1, the same percentage (~5.1%) developed from the Form 3999 letter routes is used to determine the street time unloading/loading vehicle time for SPRs.⁹

⁸ See the table provided in the Postal Service Response to CHIR No. 1, question 5b, the 'Load/Unload while clocked to street' row.

⁹ See Library Reference USPS–RM2015–2/1, October 31, 2014, 'I_FORMS_TACS.xls' file, 'TACS Ofc_Str' worksheet, cell E18.

- a. Does the loading/unloading time for letter routes versus SPRs differ?
If yes, please describe the differences.
 - b. Please explain why the same loading/unloading the vehicle percentage from the letter routes group is used for all SPR routes.
8. Please explain the reasons for the wide range in street hour values, as well as the wide range of values in the loading/unloading times for each route contained in the Form 3999 database file submitted in this docket. If the wide range of values for total street time or loading/unloading time relate to the type of route, please describe the letter route differences and explain the rationale for applying the overall letter routes group average rather than an average unloading/loading time by route type to calculate the "FORM 3999 LOADING – to Street Support" in cell E9 in the 'I_FORMS_TACS.xls' file provided in Library Reference USPS–RM2015–2/1.
9. The Postal Service states that the Form 3999 database contains a route evaluation for nearly all current active city carrier routes.
 - a. Please confirm that the route evaluations in the Form 3999 database are based on one employee for one route.
 - b. If not confirmed, please describe how each Form 3999 record in the file 'Chir1.Q6a.xlsx' provided in Library Reference USPS–RM2015–2/2 was developed.
 - c. Are the Form 3999 route evaluations provided in the file referenced above based only on full-time city carrier employee routes?
10. In various worksheets in the cost segment 'CS06&7.Revised.xls' file provided in Docket No. ACR2013 Library Reference USPS–FY13–32, Revised-2-6-14, the Postal Service labeled the IOCS activity code number 6422 'Loading Vehicle'. What had been labeled 'Loading Vehicle' for activity code number 6422 in previous dockets, now in Proposal Nine, for the same activity code number, the label reads 'Returning/Leaving'.¹⁰ Please explain the difference between the

¹⁰ See, for example, Docket No. ACR2013, Library Reference USPS–FY13–32, Revised-2-6-14, February 6, 2014, 'CS06&7.Revised.xls', 'Input CS 6' worksheet, line Nos. 17 and 25.

different labels for the same IOCS activity code number shown in the 'Chir1.Q3b.xls' file, worksheet 'Input CS6' line Nos. 17 and 25 provided in Library Reference USPS–RM2015–2/2.

Proposal Nine—Component Four: Expand the IOCS Cost Model to Use the Control Totals for the Four Carrier Categories Calculated in Component One: Full-time Regular City Carrier–Letter routes; Full-time Regular City Carrier–SPR Routes; Other City Carrier–Letter Routes; and Other City Carrier–SPR Routes

11. Some IOCS sampled employees were sampled more than once in FY 2013 and were recorded by the data collector to be assigned or assisting both a letter route and an SPR.¹¹
 - a. Under the proposal, how would employees who work or assist both letter and SPR routes in the same fiscal year be identified in the TACS and MODS operation codes?
 - b. How would the annual workhours of employees who are not assigned a specific route (e.g., Routers) be assigned to a route group given that the route group work appears to have differed during the fiscal year?
 - i. How would these employees' annual office costs be determined?
 - ii. How would these employees' annual street costs be determined?

¹¹ See the cross-tabulation based on the IOCS question 1-Employee Identification Number and the IOCS created variable F260-Final Route Code in Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, FY 2013 IOCS data file 'PRCPub13.sas'.

12. The IOCS questions identify activities, routes, and transportation types associated with overtime costs. The IOCS shows that overtime costs vary by specific route and transportation type (e.g., 'Residential–Park & Loop').¹² If the mix of mail continues to differ by route and transportation type, please explain the rationale for using one overall letter route group for each route and transportation type and one overall SPR route group for each specific SPR route to distribute costs to products within route/transportation types.
13. Do all Delivery Units and Post Offices/Stations/Branches, including those that do not perform mail processing operations, use the same MODS codes as those proposed by the Postal Service for the route groups and office/street split? If not, for those offices that do not use the same MODS codes, how does the Postal Service plan on determining:
 - a. Office versus street workhours; and
 - b. 'Letter' routes versus 'Special Purpose' routes?
 - c. For the proposed letter route group, will only the TACS LDC codes be used to determine the office and street workhours split? If not, please specify how and when the MODS operation codes would be used.
14. Please refer to worksheet '7.0.4.1' in cell I10 of the 'Chir1.Q3b.xls.' file in Library Reference USPS–RM2015–2/2, November 21, 2014.
 - a. Please confirm that the “total” street cost value of \$11,094,803,000. If not confirmed, please explain.
 - b. Please confirm that the “total” street cost value of \$11,094,803,000 in the worksheet referenced in the introductory portion of this question matches the “\$11,094,803,000” shown in Library Reference USPS–RM2015–2/1, October 31, 2014, 'I_FORMS_TACS.xls.' file, worksheet 'TACS Ofc_Str',

¹² See the cross-tabulation results Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, using IOCS question Q06D=1 for 'Pay Option Status'-'Overtime Status' and the IOCS created variable F260 for the final route code (route code = 78-'Residential – Park & Loop') in the FY 2013 IOCS data file 'PRCPub13.sas'.

column E labeled “TACS, Loading Subtracted from Total Street,” cell E7. If not confirmed, please explain.

- c. Please reconcile why both referenced cells include the same value, even though one cell, based on its label, reflects a subtraction from total costs.
- d. In the reconciliation, please specify which worksheets are affected and how they are affected.

Proposal Nine—Component Five: Replace the Current Costing Methodology for Motor Vehicle Services in Cost Segment 12, which Uses an Office/Street Percentage Split for Motorized Routes, with Data from the Delivery Operations Information System (DOIS)

- 15. Please explain the rationale for including the foot route costs in the calculation of the final vehicle use ratios shown in worksheet '7.0.4.5' in the 'Chir1.Q3b.xls' file (provided in Library Reference USPS–RM2015–2/2) cells G14 and G15.¹³
- 16. Please refer to the worksheet 'Outputs to CS' in the 'Chir1.Q3b.xls' file (provided in Library Reference USPS–RM2015–2/2) cells B16-F19. Please explain how the ‘DOIS Percentage of Workhours’ for the office and street workhours for both motorized and foot routes were derived. Please include in your response if and how the LDC and MODS operation codes on the list provided in the Library Reference USPS–RM2015–2/2 'Chir1.Q10.MODS.xlsx' file were used to obtain the office and street workhour percentages for motorized and foot routes.

Proposal Nine—Component Seven: Report data by Route Groups Rather than by Each Specific Route Type

- 17. The Postal Service Response to CHIR No. 1, question 7(c) states that TACS can be used to separate time spent on letter routes and special purpose routes, but it

¹³ The current methodology does not include foot route costs in the calculation of the final vehicle use ratios. The same final vehicle use ratios referenced in this question are used as inputs to the cost segment 12-motor vehicle services worksheet '12.0.3' in the 'Chir2.CS12_TACS.xls' file (provided along with the Responses of the United States Postal Service to Questions 1-3 of Chairman’s Information Request No. 2, November 28, 2014, question 1).

cannot be used directly to identify specific route types. Currently, costs for mixed-mail codes are distributed to classes of mail and special services by basic function within specific route code in proportion to costs for direct mail codes.¹⁴

The Postal Service has explained that this distribution process respects the tendency of the mix of mail classes to vary among route types. *Id.* The SAS programs in Docket No. ACR2013, Library Reference USPS–FY13–37 (ALBCARMM) and in Library Reference USPS–FY13–19 (Delivery Costs) distribute mail costs according to a specific route and transportation type (rather than by a single consolidated group for all letter routes and another single consolidated group for all special purpose routes as proposed).¹⁵ Please explain the differences in the mix of mail by route and transportation type and the changes that resulted in the inclusion of component seven in Proposal Nine.

18. In the portion of the Postal Service Response to CHIR No. 1 providing a status report on two questions, it stated: “Nonetheless, one can speculate that since the direct impact on unit costs in Cost Segments 6 and 7 is relatively small, one would likewise not expect much of an indirect impact on the results presented in the cost by shape model in folder 19, wherein the Cost Segment[s] 6 and 7 costs are only part of the costs considered.” Postal Service Response to CHIR No.1 at 2. The following questions relate to the Postal Service’s use of a single scaling factor in the 'Input CS6' worksheet of the 'Chir1.3b.xls' file provided in Library Reference USPS–RM2015–2/2.¹⁶

¹⁴ See USPS Periodic Report, Summary Description of USPS Development of Costs by Segments and Components, FY 2013, July 1, 2014, at 6-3, section 6.1.4.

¹⁵ These Library References in Docket No. ACR2013 contain SAS programs that perform calculations that appear to be dependent on specific IOCS tallies grouped by CAG, finance group, route-transportation type, activity and basic function.

¹⁶ The scaling factor is shown in Library Reference USPS–RM2015–2/1, October 31, 2014, 'I_FORMS_TACS.xls' file, worksheet 'TACS Ofc_Str', cell F28.

- a. How does the Postal Service know that the distribution keys would be in the same product proportions as those in the original 'InputCS6' worksheet cells C40-C94?¹⁷
- b. How does the Postal Service know that the impact of Proposal Nine would be a 3.3 percent decrease for each product and special service cost shown in the 'Input CS6' worksheet cells C40-C94?
- 19. The relevant street costs are distributed to mail products based on the mail volumes collected in the City Carrier Cost System (CCCS) by stop type.¹⁸ The worksheet '7.0.8' in the 'Chir1.Q3b.xls' file provided in Library Reference USPS-RM2015–2/2 is labeled "WS 7.0.8 Develop Dist Keys W/CCS Vol" with column headers: 'CURBLINE', 'DISMOUNT', 'FOOT', 'PARK & LOOP' and 'OTHER' and appears to present the same volumes provided in the comparable file in Docket No. ACR2013.
 - a. Please describe how, under the existing methodology, the CCCS distribution key volumes were developed and which CCCS volume distribution key groups were applied to the specific IOCS route-transportation type group street costs.

¹⁷ The Postal Service used the same values as those filed in the comparable file and worksheet in Docket No. ACR2013 and reduced each product row value by approximately 3.3% in cells C40-C94 to show the change in this worksheet under the Proposal Nine methodology in Docket RM2015-2.

¹⁸ See Docket No. R2006-1, Direct Testimony of Thomas W. Harahush on Behalf of the United States Postal Service, May 3, 2006, at 2 (USPS–T–4); and Docket No. R2006-1, USPS-LR-L-11 CCCS Statistical and Computer Documentation, May 3, 2006, at 40, which lists the same route-transportation type groups as those assigned by the IOCS for relevant street costs in the IOCS-created field F260. (See Docket No. ACR2013, Library Reference USPS–FY13–37, December 27, 2013, 'IOCSDataDictionaryFY13' file, 'Mainframe Layout' worksheet, 'Multipurpose Final Process Fields' section).

- b. Please describe how, under the proposed methodology, the CCCS distribution key volumes will be developed and which CCCS volume distribution key groups will be applied to the TACS letter and SPR route group street costs.

By the Acting Chairman.

Robert G.Taub